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Vantage Wind Energy LLC and KES Kingsburg, L.P.  
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8 UNITED STATES BANKRUPTCY COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 SAN FRANCISCO DIVISION  
11

12 PG&E CORPORATION

13 And

14 PACIFIC GAS AND ELECTRIC  
COMPANY,

15 Debtors.  
16  
17  
18

19 ☐ Affects PG&E Corporation

20 ☒ Affects Pacific Gas and Electric  
21 Company

22 ☐ Affects both Debtors

23 *\* All papers shall be filed in the Lead Case*  
24 *No. 3:19-bk-30088-DM*  
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Bankruptcy Case  
Case No. No. 3:19-bk-30088-DM

Chapter 11  
(Lead Case)  
(Jointly Administered)

**JOINDER OF VANTAGE WIND ENERGY  
LLC AND KES KINGSBURG, L.P. IN  
NEXTERA'S MOTION FOR LIMITED  
RELIEF FROM STAY TO PARTICIPATE  
IN APPELLATE PROCEEDINGS WITH  
RESPECT TO FERC ORDERS**

Date: June 26, 2019  
Time: 9:30 a.m. (Pacific Time)  
Place: United States Bankruptcy Court  
Courtroom 17, 16<sup>th</sup> Floor  
San Francisco, CA 94102

**Objection Deadline:** July 21, 2019  
4:00 p.m. (Pacific Time)

1 Vantage Wind Energy LLC and KES Kingsburg, L.P. (“Vantage and KES”), parties in  
2 interest in the above-captioned cases, hereby join in the *Motion for Limited Relief from Stay to*  
3 *Participate in Appellate Proceedings with Respect to FERC Orders* [Docket No. 2400] (the  
4 “Motion”) of NextEra Energy, Inc. and NextEra Energy Partners, L.P. (collectively, “NextEra”)  
5 (i) to permit Vantage and KES to (a) should it be necessary, seek leave from the applicable circuit  
6 court of appeals to intervene in any appeal of the FERC Orders (as defined in the Motion); (b) to  
7 the extent permitted by the applicable circuit court of appeals, participate in and prosecute to  
8 conclusion any appeal of the FERC Orders; (c) seek or oppose any request for rehearing,  
9 rehearing en banc, petition for writ of certiorari; (d) participate in the briefing and argument  
10 relating to any and all the foregoing; and (e) participate in any proceedings on remand of the  
11 FERC Orders; and (ii) to generally allow all courts and administrative agencies with jurisdiction  
12 over the appeal or remand to enter final orders relating thereto.<sup>1</sup> The Motion and this joinder are  
13 presented necessarily due to the Debtors’ *Motion of the Utility for Limited Relief From the*  
14 *Automatic Stay to Appeal Certain Matters Pending Before the Federal Energy Regulatory*  
15 *Commission* [Docket No. 2359] (the “PG&E Stay Motion”), seeking relief from the stay to allow  
16 the Debtors to pursue appellate relief from the FERC Orders, without granting the other parties in  
17 interest parallel relief from the stay to respond to the Debtors’ requests for such relief.

18 By its Motion, NextEra seeks narrowly-tailored relief to permit it to participate in the  
19 Debtors’ anticipated appeal of the FERC Orders to the extent authorized by the applicable  
20 appellate court. For the same reasons as those set forth in the Motion, Vantage and KES merit the  
21 same relief. As intervenors in the FERC Proceedings, Vantage and KES have a substantial  
22 interest in the subject matter of the FERC Proceedings and a direct stake in any appeal of the  
23 FERC Orders. It would be fundamentally unfair to allow the Debtors to appeal the FERC Orders  
24 without affording Vantage and KES an opportunity to defend their interests in connection with  
25 any such appeal.

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28 <sup>1</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

1 Accordingly, Vantage and KES respectfully request that any order modifying the  
2 automatic stay as requested in the Motion and PG&E's Stay Motion also modify the automatic  
3 stay as to Vantage and KES to permit Vantage and KES to participate in any appeal from the  
4 FERC Orders.

5 **NOTICE**

6 Vantage and KES respectfully submit that all required notice will be given by the  
7 Notification of Electronic Filing by ECF, as permitted by Paragraph 11 of the Second Amended  
8 Order Implementing Certain Notice and Case Management Procedures [Docket No. 1996].

9 Respectfully submitted,

10 DATED: June 20, 2019

CROWELL & MORING LLP

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13 By: /s/

Thomas F. Koegel  
Attorneys for Creditors and Parties-in-Interest  
Vantage Wind Energy LLC and KES Kingsburg,  
L.P.